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March 12, 2024

VIA ECF

Hon. Leo M. Gordon
United States District Court
District of New Jersey
2 Federal Square
Newark, NJ 07102

Re: *State of New Jersey v. U.S. Dep't of Transportation et al.*, No. 2:23-cv-03885

Dear Judge Gordon:

I write on behalf of the State of New Jersey (“Plaintiff” or “New Jersey”) and in response to the Court’s order, (ECF 125), directing the parties to file new copies of their summary judgment briefs with revised citations to the joint appendix. Plaintiff respectfully requests permission to also file an Amended Complaint with revised citations to the joint appendix.¹

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All counsel of record (via ECF)

¹ The Federal Defendants and the MTA/TBTA take no position on this request.